

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

ALEJANDRO JURADO JIMENEZ et al.,)	
)	
Plaintiffs,)	
)	Civil Action No. 12-C-0209
v.)	
)	Judge Griesbach
GLK FOODS, LLC and RYAN A. DOWNS,)	
)	
Defendants.)	

**CLASS MEMBERS' MOTION
FOR PARTIAL SUMMARY JUDGMENT ON COUNTS III, VI, VII, AND VIII**

Pursuant to Federal Rule of Civil Procedure 56 and Civil Local Rule 56, the 2010 and 2011 Classes certified for purposes of liability under Counts III, VI, VII, and VIII move for summary judgment as to liability on those counts of the Second Amended Complaint. A separate memorandum in support of this motion and accompanying proposed statement of undisputed material facts are being filed concurrently with this motion.

WHEREFORE, for the reasons stated in the memorandum supporting this motion, the 2010 and 2011 Classes certified for purposes of liability under Counts III, VI, VII, and VIII request entry of a liability judgment in their favor on those counts for Defendants' failure to employ Class Members for the full-term of promised employment without justification, for Defendants' failure to pay Class Members the prevailing wage and the Wisconsin living wage for 40 hours or more of work per week, and for Defendants' failure to cover the cost of return transportation for Class Members, all in violation of the AWP (Count III), the common law of contract (Count VI), the WMLA work agreement requirement (Count VII), and Wisconsin's wage payment and living wage laws (Count VIII).

Dated: February 20, 2015

Matthew J. Piers
Joshua Karsh
José J. Behar
Claudia Flores
Jenna Miara
Attorneys for Class Members
Hughes Socol Piers Resnick & Dym, Ltd.
70 W. Madison Street, Suite 4000
Chicago, IL 60602
Telephone: (312) 580-0100
Fax: (312) 580-1994
E-mail: mpiers@hsplegal.com
jkarsh@hsplegal.com
jbehar@hsplegal.com
cflores@hsplegal.com
jmiara@hsplegal.com

s/ Joshua Karsh
One of Class Members' Attorneys

Ali Beydoun
Attorney for Class Members
Farmworker Justice
1126 16th Street, N.W., Suite 270
Washington, D.C. 20036
(202) 293-5420 ext. 308
E-mail: abeydoun@farmworkerjustice.org

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document will be served on counsel listed below by CM/ECF on February 20, 2015.

Michael Aldana, Esq.
Quarles & Brady LLP
411 East Wisconsin Avenue, Suite 2040
Milwaukee, WI 53202
Michael.Aldana@quarles.com

s/ Joshua Karsh
One of Plaintiffs' Attorneys